

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ERIKA LOPEZ, and all others similarly §  
situated under 29 U.S.C. 216 (b), §  
Plaintiff, §  
§  
§ Cause No. 3:12-cv-04604-BK  
v. §  
§  
KIM C. YOUNG *also known as* §  
YOUNG CHAE KIM *also known as* §  
HYUN CHAE KIM *doing business as* §  
WASH & PRESS COIN LAUNDRY §  
*also known as* WASH N PRESS §  
Defendant. §

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PLAINTIFF'S PRETRIAL DISCLOSURES

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To: Defendant, by and through his attorney of record, Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.

Plaintiff, Erika Lopez, makes these pretrial disclosures as required by Federal Rule of Civil Procedure 26(a)(3) and the Scheduling Order of the Court (**DE 28**).

**A. Witnesses**

1. Plaintiff expects to call the following witnesses at trial:
  - a. Erika Lopez, c/o J.H. Zidell, P.C., 6310 LBJ Freeway, Ste. 112, Dallas, Texas 75240.
  - b. Kim C. Young a/k/a Young Chae Kim a/k/a Hyun Chae Kim d/b/a Wash & Press Coin Laundry a/k/a Wash N Press, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
2. Plaintiff may call the following witnesses if the need arises:
  - a. Custodian of records for Young Chae Kim d/b/a JC Coin Laundry, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.

- b. Custodian of records for Young Chae Kim d/b/a Homeboy Dallas Convenience Store, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- c. Custodian of records for J. Land Plaza LLC, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- d. Custodian of records for J. Land Partners Ltd., c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- e. Custodian of records for Young Chae Kim d/b/a Sonny's Food Mart, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- f. Custodian of records for Young Chae Kim d/b/a Nine Corners Store, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- g. Custodian of records for Nine Corners Inc., c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- h. Custodian of records for J Land Partners Ltd., c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- i. Custodian of records for J Land Plaza LLC, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810.
- j. Hae Kyung Kim, c/o Jason Choe, 2000 Royal Lane, Suite 205, Dallas, Texas 75229, Tel: 214-565-9810; or 1401 Tarragon Drive, Flower Mound, Texas 75208.
- k. In Song Yi, 1120 N. Beltline Road, Irving, Texas 75061.
- l. Benita Felipe, last known address and telephone number believed to be known by Defendant.
- m. Plaintiff reserves the right to call any witnesses designated by Defendant.

#### **B. Depositions**

- 3. Plaintiff expects to call the following witnesses by deposition:
  - a. None at this time. Plaintiff reserves the right to use all or part of any deposition taken in the case if the witness is not available, for impeachment, or for any other use allowable under the law.

**C. Exhibits**

4. Plaintiff expects to offer the following exhibits:
  - a. Copy of a time log.
  - b. 2007 tax records for Kim C. Young a/k/a Young Chae Kim a/k/a Hyun Chae Kim.
  - c. 2008 tax records for Kim C. Young a/k/a Young Chae Kim a/k/a Hyun Chae Kim.
  - d. 2009 tax records for Kim C. Young a/k/a Young Chae Kim a/k/a Hyun Chae Kim.
  - e. 2010 tax records for Kim C. Young a/k/a Young Chae Kim a/k/a Hyun Chae Kim.
  - f. 2011 tax records for Kim C. Young a/k/a Young Chae Kim a/k/a Hyun Chae Kim.
  - g. 2012 tax records for Kim C. Young a/k/a Young Chae Kim a/k/a Hyun Chae Kim.
5. Plaintiff may offer the following exhibits if the need arises:
  - a. Plaintiff reserves the right to use any exhibits designated by Defendant and admitted into evidence.

Respectfully submitted,

By: /s/ Joshua A. Petersen  
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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all counsel and parties of record by electronic service in accordance with the local rules of United States District Court for the Northern District of Texas, Dallas Division this 24<sup>th</sup> day of August, 2015.

/s/ Joshua A. Petersen

Joshua A. Petersen

Counsel for the Plaintiff(s)